

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

United States of America
ex rel. ALEX DOE, Relator,

The State of Texas
ex rel. ALEX DOE, Relator,

The State of Louisiana
ex rel. ALEX DOE, Relator,
Plaintiffs,

v.

Planned Parenthood Federation of America, Inc.,
Planned Parenthood Gulf Coast, Inc., Planned
Parenthood of Greater Texas, Inc., Planned Parenthood
South Texas, Inc., Planned Parenthood Cameron
County, Inc., Planned Parenthood San Antonio, Inc.,

Defendants.

CIVIL ACTION NO. 2:21-CV-
00022-Z

Date: December 16, 2022

**DEFENDANTS' MOTION TO EXPEDITE BRIEFING
OF DEFENDANTS' MOTION TO COMPEL**

On December 16, 2022, Defendants Planned Parenthood Gulf Coast, Inc., Planned Parenthood of Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., Planned Parenthood San Antonio, Inc. (together, "Affiliate Defendants"), and Planned Parenthood Federation of America, Inc. (together with Affiliate Defendants, "Defendants"), filed a Motion to Compel the State of Texas To Revise its Privilege Log and Produce Certain Documents ("Defendants' Motion"). Pursuant to an Order issued by the Court

on December 16, 2022 Order (“Order”), Defendants must respond to the State of Texas’s Motion to Compel Defendants’ Production of Documents Identified on Defendant’s Privilege Logs (“Plaintiff’s Motion”) by December 21, with any reply due on December 23. ECF 345. Defendants respectfully request that the Court order Texas to respond to Defendants’ Motion on the same expedited schedule.

DISCUSSION

As outlined in Defendants’ Motion, Defendants respectfully move the Court, pursuant to Federal Rule of Civil Procedure 37, for an order compelling the State of Texas to produce certain documents withheld as privileged, to submit affidavits explaining the process it used to determine which documents are privileged, and to revise its privilege logs in accordance with the Joint Proposed Order Regarding the Production of Electronically Stored Information and Hard Copy Documents [Dkt. 130], which was entered by the Court [Dkt. 139], and the Court’s November 8, 2022 Order [Dkt. 262].

In its December 16, 2022 Order, the Court ordered Defendants to respond to Texas’s Motion to Compel, filed on December 15, 2022, on or before December 21, 2022 [Dkt. 345]. The Court also ordered Texas to file any reply on or before December 23, 2022 [Dkt. 345]. A briefing schedule for Defendants’ Motion in line with the Court’s December 16 Order will allow for the issues raised in Defendants’ Motion to be resolved as expeditiously as possible. Therefore, Defendants respectfully request that the Court order Texas to respond to Defendants’ Motion on or before December 21, 2022, and that Defendants file any reply on or before December 23, 2022.

CONCLUSION

For the foregoing reasons, Defendants respectfully request that the Court expedite briefing. Defendants propose that the Court order Plaintiffs’ response to Defendants’ Motion to Compel the

State of Texas be filed on or before December 21, 2022, and Defendants to file any reply on or before December 23, 2022.

Dated: December 16, 2022

Respectfully submitted,

Arnold & Porter Kaye Scholer LLP

By: /s/ Tirzah S. Lollar

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CERTIFICATE OF SERVICE

I hereby certify that on December 16, 2022, the foregoing document was electronically filed with the Clerk of Court using CM/ECF.

/s/ Tirzah S. Lollar

Tirzah S. Lollar